



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

NOV 07 2008

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Return Receipt Requested

GENERAL NOTICE LETTER
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Pat Kinzy
Chief Executive Officer
Automation Plating Corporation
927 Thompson Ave
Glendale, CA 91201

Re: General Notice Letter for San Fernando Valley Area 2 Superfund Site –
Glendale Chromium Operable Unit.
927 Thompson Ave Facility, Glendale, CA

Dear Mr. Kinzy:

Under the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"),¹ commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency ("EPA") is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment. EPA has documented that such a release has occurred at the San Fernando Valley Area 2 site, Glendale Chromium Operable Unit ("Chromium OU"), which is located in Los Angeles County, California. EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Chromium OU. This General Notice Letter is to notify you that EPA has determined that your company may be responsible under CERCLA for cleanup of the Chromium OU or costs EPA has incurred or will incur in the investigation and cleanup of the Chromium OU.

¹ 42 U.S.C. §§ 9601 *et seq.*

Explanation of Potential Liability

Under CERCLA, potentially responsible parties ("PRPs") may be required to perform investigation and cleanup actions at a site that has been impacted by hazardous substances and/or be responsible for costs incurred by EPA to investigate or clean up such a site. PRPs include current owners or operators of property that is the source of contamination, former owners or operators of such property at the time of disposal of hazardous substances, persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected by EPA to date, EPA believes that your company may be liable under CERCLA with respect to the Chromium OU, as the current or previous owner and/or operator of a facility within the Chromium OU.

Description of Chromium OU

The Chromium OU is generally located within the San Fernando Valley Area 2 (Crystal Springs) Superfund Site, which was added to the National Priorities List ("NPL") in 1986. The Chromium OU is within the general geographic area occupied by the North and South Glendale Operable Units (collectively, "GOU") of Area 2. The GOU is principally concerned with contamination by volatile organic compounds ("VOCs"), primarily trichloroethylene ("TCE") and tetrachloroethylene ("PCE"), to soils and groundwater.

EPA has taken several response actions at the GOU under CERCLA. In 1993, EPA issued Interim Records of Decision ("RODs") for the GOU, in which EPA selected interim remedies for the VOC contamination at the GOU. The interim remedies require the extraction and treatment of groundwater and delivery of the treated groundwater to the City of Glendale's potable water supply. Since 2000, a group of parties known as the Glendale Respondents Group ("GRG") has conducted the operation and maintenance of the GOU interim remedies under a consent decree with EPA. EPA recognizes that your company may be a member of the GRG and parties to the consent decree for the GOU.

The 1993 interim remedies did not include measures specifically to address chromium contamination. Recently, chromium contamination has been detected in increasing concentrations in area groundwater and has impacted the operation of the interim remedies. The chromium contamination that is affecting the interim remedies is being addressed in that context by the GRG. At this time, the work being performed by the GRG does not encompass measures to address chromium contamination apart from the effect of chromium contamination on GOU operations.

EPA has established the Chromium OU to encompass the investigation, evaluation, selection and implementation of a remedy specifically to address chromium in the GOU area groundwater. EPA has incurred and will incur costs to investigate, evaluate, select, and implement remedial actions for the Chromium OU. This General

Notice Letter provides you with advance notice that EPA may seek to recover its costs from your company for such response actions, and/or may ask your company to perform work at the Chromium OU. Such costs will be in addition to any costs that your company has incurred or may incur as a member of the GRG in connection with the GOU interim remedies and the consent decree.

Financial Concerns/Ability to Pay Settlements

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within that category, please contact Andrew Taylor of EPA at 75 Hawthorne Street (SFD-7-5), San Francisco, CA, 94105, (415) 972-3129, Taylor.Andrew@epa.gov, for information on "Ability to Pay Settlements." If you make an inability or limited ability to pay claim, you will receive a letter requesting financial information to document your claim, which may include but not be limited to tax returns, financial statements, and other information that will assist EPA to conduct an analysis. If EPA concludes that your company have a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that, because EPA has a potential claim against your company, you must include EPA as a creditor if your company files for bankruptcy or your company is placed in receivership.

Information to Assist You

EPA would like to encourage communication between you, other PRPs, and EPA at the Site. EPA typically recommends that all PRPs meet to select a "steering committee" that will be responsible for representing the group's interests. Establishing a manageable group is critical to successful negotiations with EPA. If this is not possible, EPA encourages each PRP to select one person from its company or organization to represent its interests to EPA.

To assist you in these efforts, EPA is enclosing a list of all persons to whom this letter is being or has been sent. Please note, however, that EPA is at an early stage in its investigation and expects to issue additional General Notice letters as its investigation progresses. EPA will send you an updated list of General Notice letter recipients as this occurs so that you will be informed of the identities of all parties that EPA has identified as potentially responsible for the Chromium OU.

EPA will establish an Administrative Record that contains documents that serve as the basis for EPA's selection of cleanup actions for the Chromium OU. The Administrative Record for the 1993 RODs is located at the Glendale Public Library, 222 East Harvard Street, Glendale, California, 91205, (213) 548-2021, and is available to you and the public for inspection. That Administrative Record is also available for inspection at the Superfund Records Center, EPA Region 9, 95 Hawthorne Street, 4th floor, San

Francisco, CA, 94105. As EPA moves forward with selection of response actions for the Chromium OU, EPA will supplement the Administrative Record or create a separate Administrative Record for the Chromium OU. EPA also may issue advance notice of the proposed action(s) for public comment.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at <http://www.epa.gov/swerosps/bf/sblrbra.htm> and review EPA guidances regarding these exemptions at <http://www.epa.gov/compliance/resources/policies/cleanup/superfund>.

In addition, if you are a "service station dealer" who accepts used oil for recycling, you may qualify for an exemption from liability under Section 114(c) of CERCLA. EPA guidance regarding this exemption can be found on the Internet at <http://www.epa.gov/compliance/resources/policies/cleanup/superfund>. If you believe you may qualify for the exemption, please contact Marie M. Rongone, Senior Counsel, at 75 Hawthorne Street, San Francisco, CA, 94105, (415) 972-3891, Rongone.Marie@epa.gov, to request an application/information request specifically designed for service station dealers.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, EPA has developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA"), which is enclosed with this letter.

104(e) Information Request

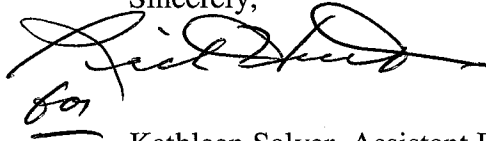
In addition to the notice explained in this letter, EPA is also seeking your cooperation in providing information you may have about the Site, by responding to the enclosed Information Request. Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. '9604(e)(5). We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request within thirty (30) calendar days of your receipt of this letter. Details and instructions are provided in the enclosure.

Request for Contact Information

Please provide EPA with the name, address, e-mail address and telephone number of the person to whom EPA should direct future correspondence with your company. A contact form is provided for your convenience in providing this information to EPA.

Please give these matters your immediate attention and consider consulting with an attorney. If you have any questions regarding this letter or the site, please contact Bob Fitzgerald at (213) 244-1814, Fitzgerald.Bob@epa.gov regarding the Chromium OU or the work, or Marie Rongone in our Office of Regional Counsel, at the mailing address, telephone number and e-mail address given above, with regard to any legal matters. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Salyer", with a horizontal line underneath.

Kathleen Salyer, Assistant Director
Superfund Division
California Site Cleanup Branch

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Enclosure to General Notice Letter:

General Notice Recipient List

| Facility Address | Mailing Addressee |
|---|---|
| ITT Aerospace Controls Divisions Facility ITT INDUSTRIES, INC. 1200 SOUTH FLOWER STREET BURBANK, CALIFORNIA 91502 | Ms. Teresa Olmsted Director of Environmental Programs ITT Industries, Inc. 1054 North Tustin Avenue Anaheim, California 92807 |
| EXCELLO PLATING COMPANY INC. 4057 GOODWIN AVENUE LOS ANGELES, CALIFORNIA 90039 | Ms. Alice C. Clarno The Spirito Family Trust 1801 South Myrtle Avenue, Suite H, Monrovia, California 91016-4800 |
| FORMER MENASCO AEROSPACE FACILITY? 100 EAST CEDAR AVENUE AVENUE BURBANK, CALIFORNIA 91502 | Mr. Bruce C. Amig Director of Global Remediation Services Goodrich Corporation Four Coliseum Center 2730 West Tyvola Road Charlotte, North Carolina 28217 |
| Former Cortaulds Aerospace facility PRC-DESOTO INTERNATIONAL, INC. 5430 SAN FERNANDO ROAD GLENDALE, CALIFORNIA 91203 | Mr. Christer Sorensson Global Environmental, Health & Safety Manager PRC-DeSoto International, Inc. 5430 San Fernando Road Glendale, California 91203 |
| Various Facilities | Robert J. Stevens President and CEO Lockheed Martin Corporation 6801 Rockledge Dr., Mail Drop 200-4 Bethesda, MD 20817 |
| Various Facilities | Linda Gertler Lockheed Martin Energy, Environment, Safety & Health 2950 N. Hollywood Way, Suite 125 Burbank, CA 91505 |
| Former Plating Facility of Drilube 718 W. Wilson Ave. Glendale, CA 91203 | Art Mazmanian FX-6 Personal Privacy [REDACTED] |
| Former Plating Facility of Drilube 718 W. Wilson Ave. Glendale, CA 91203 | Hovsep Boghossian FX-6 Personal Privacy [REDACTED] |
| Former Plating Facility of Drilube 711 West Broadway Glendale, California | Artik Avanesians Private Residence Glendale Ca |
| All Metals Processing 264 W. Spazier Ave. Burbank, California 91502 | Estate of Helen L. Powers Stewart R. Albertson, Esq. Ziprick & Cramer, LLP 707 Brookside Avenue Redlands, California 92373 |

Enclosure to General Notice Letter:

General Notice Recipient List (Continued)

| Facility Address | Mailing Addressee |
|---|--|
| All Metals Processing Company 264 W. Spazier Ave. Burbank, California 91502 | Timothy Roach Private Residence Camarillo, CA |
| Automation Plating Corporation 927 Thompson Ave Glendale, CA 91201 | Patrick Kinzy Automation Plating Corporation 927 Thompson Ave Glendale, CA 91201 |
| Former Weber Aircraft Facility 2820 N Ontario St., Burbank, CA | Mike Rozenblatt Mag Aerospace Industries, Inc. 1500 Glen Curtis St. Carson CA 90746 |



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture

(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry

(www.ecarcenter.org)

Automotive Service and Repair

(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry

(www.chemalliance.org)

Construction Industry

(www.cicacenter.org or 1-734-995-4911)

Education

(www.campuserc.org)

Healthcare Industry

(www.hercenter.org or 1-734-995-4911)

Metal Finishing

(www.nmfr.org or 1-734-995-4911)

Paints and Coatings

(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing

(www.pwbrc.org or 1-734-995-4911)

Printing

(www.pneac.org or 1-888-USPNEAC)

Transportation Industry

(www.transource.org)

Tribal Governments and Indian Country

(www.epa.gov/tribal/compliance or 202-564-2516)

US Border Environmental Issues

(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page

www.epa.gov

Small Business Gateway

www.epa.gov/smallbusiness

Compliance Assistance Home Page

www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance

www.epa.gov/compliance

Voluntary Partnership Programs

www.epa.gov/partners





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Enclosure to General Notice Letter:

Information Request

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions (Attachment B) within forty five (45) days of your receipt of this letter.

Under Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. §9604(e), EPA has broad information gathering authority. Please note that your compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$32,500 per day of noncompliance. Please be further advised that provision of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil, and criminal proceedings.

Certain information which EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Attachment A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information that may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

Instructions on how to respond to the questions contained in Attachment B are described in Attachment A. Please return your written response to this request for information, signed by you or a duly authorized representative, within forty five (45) calendar days of receipt of this letter. Please direct your response to:

Andrew Taylor, SFD-7-5
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Your response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this matter on your behalf.

Attachment A (Instructions and Definitions)

Attachment B (Information Requests)

ATTACHMENT A: INSTRUCTIONS AND DEFINITIONS

Instructions

You are requested to answer the questions listed in Attachment B and to furnish the requested documents in the following manner:

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this Information Request, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. When answering the questions in Attachment B, please precede each answer with the corresponding number of the question and subpart to which it responds.
3. Number Each Document. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to you constitutes non-compliance with this mandatory Information Request.
5. Identify Sources of Answer. For each question, identify all the persons and documents that you relied on in producing your answer. Please refer to the list of definitions for specific definitions of the terms, "documents," "persons", and "you."
6. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Information Request become known or available to you after you respond to this Information Request, EPA hereby requests pursuant to the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 104(e) that you supplement your response to EPA.
7. Scope of Request. The scope of this Information Request includes all information and documents independently developed or obtained by research on the part of you, your business (e.g., corporation, partnership), and your or your business's attorneys, consultants, or employees, or any of their agents, consultants, or employees.

8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F. R. §2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. clearly identify the portions of the information alleged to be entitled to confidential treatment;
- b. the period of time for which confidential treatment is desired (*e.g.*, until a certain date, until the occurrence of a specific event, or permanently);
- c. measures taken by you to guard against the undesired disclosure of the information to others;
- d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f. whether you assert that disclosure of the information likely would result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

9. Disclosure to EPA's Authorized Representatives. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which the Agency may disclose information contained in your response are as follows: 1) CH2M Hill (EPA Contract No. 68-W9-0031); 2) GRB Environmental Services Inc. (Contract No. EP-R9-0603), and (3) Science Application International Corp. (Contract No. GF-10F-0076J).

This information may be made available to these authorized representatives of EPA to assist with document handling, inventory, and indexing. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the 45 day period in which the response is due.

10. Objections to Questions. If you have objections to some or all of the questions contained in the Information Request, you are still required to respond to each of the questions.

Definitions

The following definitions apply to the requests contained in Attachment B.

1. **"YOU" or "Respondent."** The term "YOU" or "Respondent" shall mean the addressee of this Request, the addressee's officers, enlisted personnel, managers, employees, contractors, agents, servants, representatives, or other persons directly or indirectly employed or retained by it, or anyone else acting on its behalf or otherwise subject to its control.
2. **Identify.** The term "identify" means, with respect to a document, to provide its customary business description, its date, its number (e.g., invoice or purchase order number), the identity of the author, addressee and/or recipient and the substance or the subject matter.
3. **Glendale Consent Decree.** The term "Glendale Consent Decree" means the consent decree entered between the United States and the certain parties in the United States District Court, Central District of California, on August 2, 2000, styled *United States v. ITT Industries, Inc.*, Civ. No. 99-00552 MRP (ANx).

4. **DOCUMENT OR DOCUMENTS.:** The terms "DOCUMENT" and "DOCUMENTS" shall mean any object that records, stores or presents information and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack, optical disk, any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, optical disk, tape or other type of memory and together with printouts of such punch card, disc or disc pack, optical disk, tape or other type of memory) and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document.
5. **Glendale Operable Units.** The term "Glendale Operable Units" shall refer to the Glendale North and South Operable Units of the San Fernando Valley Area 2 (Crystal Springs) Superfund Site. The Glendale Operable Units are generally located geographically in Glendale and Burbank, California.
6. **"Site"** shall mean the **Glendale Chromium Operable Unit**, which is generally located in the same geographic areas as the Glendale Operable Units.
7. **And and Or.** The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
8. **Undefined Terms.** All terms not defined herein shall have their ordinary meaning unless such terms are defined in CERCLA, 42 U.S.C. §§ 9601 et seq., in which case the statutory definitions shall apply.
9. **Company.** The term "Company" shall include any business entity formed of one or more individuals to conduct business in the state of California or any other state, and shall include and not be limited to corporations, partnerships, sole proprietorships, limited liability companies and any other business entity.
10. **Correspondence.** The term "correspondence" shall include any notes of any kind including but not limited to records of telephone conversations and meetings, letters, and any other written and electronic forms of communication.
11. **Corporation.** The term "corporation" includes an organization whose characteristics

require it to be classified for purposes of taxation or state law as a corporation rather than as another type of organization such as a partnership or a trust.

12. **Partnership.** The term "partnership" includes a syndicate, group, pool, joint venture, partnership association, or any other unincorporated organization through or by means of which any business, financial operation or venture is carried on, and which is not within the meaning of a corporation, a trust or an estate, as defined herein; the term "partner" includes a member in such syndicate, group, pool, joint venture, or organization.
13. **Sole Proprietorship.** The term "sole proprietorship" includes any business entity under the ownership of a single individual or group of individuals that have not formed another form of business entity.
14. **Limited Liability Company.** The term "limited liability company" includes an organization whose characteristics require it to be classified for purposes of taxation or state law as a limited liability company rather than as another type of organization such as a partnership or a trust.
15. **Facility.** The term "facility" shall mean your business facility located within the Glendale Operable Units and/or the Glendale Chromium Operable Unit as defined herein.
16. **Person.** The term "person" shall have the same definition as in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21), and includes an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State or any interstate body.
11. **Trust.** The term "trust" includes any trust, including but not limited to, ordinary trusts and business or commercial trusts. An ordinary trust refers to an arrangement created by will or inter vivos instrument under which the trustee(s) takes title to the property for the purpose of protecting or conserving it for the beneficiary(ies) under the ordinary rules applied in chancery or probate courts. A business or commercial trust refers to a trust created by the beneficiary(ies) as a device to carry on a profit-making business through business organizations that are classified for tax purposes or under state law as corporations or partnerships.

**ATTACHMENT B:
INFORMATION REQUESTS**

1. If YOU are an individual, state your full name. If you are a Company, as defined in Attachment A:
 - a. State the correct legal name of the Company.
 - b. State the name(s) and address(es) of the President and Chief Executive Officer of the Company, or other presiding officer of the Company.
 - c. Identify and describe the Company's corporate or other organizational status. For example, is your Company a corporation, limited liability company or corporation, partnership, limited partnership, "S" partnership, sole proprietorship, joint venture or other type of organization?
 - d. Identify the state of incorporation or other formation of your Company and the Company's agents for service of process in that state and in California.
 - e. If the Company is a subsidiary, parent or other affiliate of another corporation, identify these related companies.
 - f. Identify the state of incorporation or other formation of these companies and their agents for service of process in that state and in California.
2. Provide any DOCUMENTS evidencing formation of your Company's organization, such as Articles of Incorporation, Partnership Agreements, Joint Venture Agreements, or other such DOCUMENTS.
3. If your Company is the parent, subsidiary, holding company, other affiliate of any other company or organization, describe in detail all such relationships, and
 - a. Identify the dates of such associations and the manner in which they were effectuated (e.g. merger, sale of stock, etc.); and
 - b. Provide any DOCUMENTS evidencing the formation of such relationship.
4. If your Company is one of many subsidiaries of a common parent or group of parents, identify all other subsidiaries of the same parent and all other parents or holding companies of any such parent.
5. State whether your Company has been acquired by another entity or portion of any other entity at any time. If the answer is yes, identify the nature of the acquisition (e.g. merger, sale of stock, etc.) and provide all DOCUMENTS evidencing such acquisition.
6. State the name, title, address and telephone number of any person who prepared or worked on the preparation of this response.
7. State the total revenues for your Company for each of the last five years.
8. State the number of persons employed by your business during the last five years, as follows: 1) the number of full-time employees; 2) the number of part-time employees; 3) the number of seasonal employees; and 4) the total number of employees.

For the following questions nos. 9 – 18, if your Company is engaged in more than one type of business activity at multiple locations, please limit your responses to the Facility or Facilities that are located within the Glendale Operable Units and/or the Glendale Chromium Operable Unit.

9. Please describe the Company's business activity, its business activity code number and the type of product and/or service your company provides (as reported in your most recent federal tax return).
10. Describe in narrative fashion the nature of the business in which the Company is engaged, e.g. manufacturing, retail or wholesale sales, service, etc.:
 - (a) identify the specific products or services the Company manufactures or provides, as applicable;
 - (b) state the dates during which the Company has been engaged in such business;
 - (c) identify the substances, including but not limited to hazardous substances, pollutants or contaminants that are or were used in the Company's business and how such substances are stored and used by the business, and provide Material Safety Data Sheets ("MSDS") for all such substances for which an MSDS is required to be maintained by the Company; if the Company is required to report the type and quantity of such chemicals or other substances stored or used at the Facility to any federal or state agency or entity, provide copies of such reports for the last twenty (20) years, or as available;
 - (d) state whether there have been any releases of hazardous substances, pollutants or contaminants to the environment at the Facility or Facilities and provide any documents describing, evidencing or otherwise documenting such releases; and
 - (e) if YOU have previously been engaged in a different business at the Facility or Facilities, describe the nature of that business, provide the dates during which YOU engaged in that business, and respond to questions 10(a)-(d) with respect to that business.
11. Identify the specific process steps that are or were used at the Facility or Facilities including but not limited to:
 - a. All materials introduced during manufacture or other process;
 - b. The means by which materials were prepared for processing;
 - c. A narrative, stepwise description of any manufacturing or other process;
 - d. A description of any waste streams generated from any manufacturing or other process; and
 - e. Provide documents describing any such process, including but not limited to process flow charts and diagrams.

12. Describe in narrative fashion the generation, treatment and disposal of all waste streams generated by processes performed by your Company at the Facility or Facilities, including but not limited to:
 - a. the source of any waste streams;
 - b. the chemical composition and characteristics of the influent, effluent, and/or any sludges, scum, or other waste formed in the treatment processes; and any chemicals or substances used in the treatment processes, including but not limited to the chromium or other metals content of such influent, effluent or waste;
 - c. the means of treatment of any such waste streams;
 - d. how any waste streams are or were stored or disposed; and
 - e. provide any DOCUMENTS that describe, evidence or document such generation, treatment or disposal.
13. Identify and provide copies of any documentation of any hazardous waste-related tax paid by YOUR company related to any facility from which waste was sent to an off-site disposal facility, and identify the dates upon which YOU paid such taxes, including but not limited to a description of whether such tax(es) were local, state or federal and the specific regulations under which YOU were required to pay the tax.
14. List all federal, state and local permits and/or registrations and their respective permit numbers issued concerning the Facility.
15. State whether your Company has or had a permit or permits issued under the Resource, Conservation and Recovery Act ("RCRA") for the Facility or Facilities. If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.
16. State whether your Company has or had a permit or permits under state hazardous waste laws for the Facility or Facilities. If the answer is "yes," identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.
17. State whether your Company has or had an EPA Identification Number or an identification number supplied by the state Environmental Protection Agency at any time. Supply any such identification number(s) your company or business has or had during that time.
18. State whether any person, other than YOU or the COMPANY, at any time arranged for disposal or treatment or arranged for transportation for treatment and disposal of materials at or to the Facility or Facilities. For each such arrangement, identify:
 - a. The persons with whom such arrangements were made;
 - b. Every date on which such arrangements were made;

- c. The nature, including the chemical content, characteristics, physical state (e.g. solid, liquid) and quantity (volume, weight) of all materials involved in each such arrangement;
 - d. The owner of the materials that were sent to the Facility or Facilities;
 - e. All tests, analyses, analytical results or manifests concerning any materials included in such arrangement;
 - f. The precise locations at the Facility or Facilities at which each such material was disposed or treated, or both;
 - g. Who selected the location to which the materials were sent to be disposed and/or treated;
 - h. The amount paid in connection with each such arrangement, if any, the method of payment, and the identity of the persons involved in each such arrangement;
 - i. Where the persons identified in "h" above intended to have the materials involved in each arrangement treated or disposed and all evidence of that intent;
 - j. Any measures or other analyses taken by you to determine how and where treatment or disposal of the materials involved in each arrangement would actually take place;
 - k. The markings on and type, condition and number of containers in which the materials were contained when they were stored, disposed, treated or transported for disposal or treatment at the Site; and
 - l. Provide all logbooks, ledgers, or other DOCUMENTS that concern or reflect records of the transportation of such materials to the Facility or Facilities.
19. Provide the names, addresses and telephone numbers of any individuals, including former and current employees, who may be knowledgeable of your Company's operations and/or hazardous substance, waste or pollutant or contaminant handling, storage and disposal practices at the Facility or Facilities.

PRIMARY CONTACT DESIGNATION FORM

Automation Plating Corporation for 927 Thompson Ave, Glendale, CA

PLEASE COMPLETE AND RETURN THIS FORM WITH YOUR RESPONSE TO THE ENCLOSED 104(e) INFORMATION REQUEST WITHIN 45 CALENDAR DAYS OF RECEIPT

Please complete this form by printing or typing the requested information. If any of the information provided on this form changes after submission of the form including, but not limited to, changes in corporate relationships, please notify EPA at the address listed below as soon as possible. Thank you for your cooperation.

1. Please provide the following information for the single person who will be the above-named company's or individual's contact for all future communications (including correspondence, informational mailings, etc.) from EPA regarding the San Fernando Valley Area 2 Superfund Site – Glendale Chromium Operable Unit. You may designate a legal or other representative as the single primary contact. Please enter "N/A" if the requested information is not applicable to you.

| | |
|--|------------------|
| Company/Organization/Individual Name: (only if different from above): | |
| Name of Designated Contact : | Contact's Title: |
| Contact's Firm Name: | |
| Street Address (no P.O. Box): | |
| City, State & Zip: | |
| Telephone Number: | Fax Number: |
| E-mail Address: | |
| Web-site Address: | |
| 2. Other information: Law/Consulting Firm Name (if applicable): | |

3. Printed Name and Signature of Person Completing This Form

| | | |
|--------------|-------|----------------------|
| Printed Name | Title | Company/Organization |
| Signature | | Date |

4. Please return this form to:

Andrew Taylor, Case Developer
Mail Code SFD-7-5
U.S. Environmental Protection Agency
75 Hawthorne St.
San Francisco, CA 94105